

BUCKLEY ■ MADOLE

May 6, 2014

Via Facsimile (856-757-5296) and Regular Mail

The Honorable Ann Marie Donio,
United States Magistrate Judge
United States District Court, District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Dawn M. Zieger, John F. Zieger. v. JPMorgan Chase Bank, N.A., et al.
Civil Action No. 1:14-cv-02110-RMB-AMD

Dear Judge Donio:

This firm represents the Defendants, JPMorgan Chase Bank, National Association (incorrectly plead as "J. P. Morgan Chase Bank, N.A." and "Chase Home Finance, LLC"), MERSCORP Holdings, Inc. and Mortgage Electronic Registration Systems, Inc. (incorrectly plead as "MERSCorp, Inc. (MERS, Inc.)") and Fannie Mae (more correctly known as Federal National Mortgage Association) (the "Chase Defendants") in the above referenced matter. We write to request an extension of time to answer or otherwise respond to the summons and complaint in this action.

At this time, it is unclear whether the Chase Defendants were properly served and therefore we are not certain when the time to respond actually expires. We have attempted to contact the pro se Plaintiffs by telephone to discuss service and the extension or fixing of a time to answer but we have not received a return call.

Accordingly, the Chase Defendants respectfully request an extension of time to respond to the summons and complaint to, and including, June 6, 2014, or such other date as granted by the Court.

We look forward to hearing from Your Honor's Chambers. Thank you for the Court's courtesies.

Respectfully yours,
Buckley Madole, P.C.

By: 

Richard P. Haber

So Ordered this 8th day of

MAY 2014


Ann Marie Donio, USMJ

Cc: Dawn Zieger & John Zieger
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Salem, NJ 08079